

EXHIBIT C

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By Email

December 31, 2021

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Re: Innovatus Capital Partners v. Neuman, et al.

Dear Mike:

We are writing in response to your two letters of December 16, 2021 regarding purported document production deficiencies.

With respect to the seven-page letter, we've spent hours investigating the matters you identified. During the course of our efforts, we located three additional documents relating to equity transactions which will be produced shortly. We note that, in a number of respects, your purported summary of the transactions reflected in the documents previously produced is simply inaccurate. Beyond that, we believe your letter is based on a number of assumptions you have made which are not accurate. In any event, having conducted a good faith investigation, and having now produced the few additional documents we located in doing so, we have confirmed that the responsive documents have been produced.¹

With respect to the three-page letter, the Court's November 24 Order confirmed the understanding we had of our discovery obligations all along. It appears that Innovatus is unwilling to accept the Court's order. We have complied with our discovery obligations.

Sincerely,

s/Jason C. Raofield
Jason C. Raofield

¹ With respect to redaction of investor names, your letter deliberately ignores that Innovatus has concealed the names of not only investors in Redibs but also *potential* investors in Redibs. Innovatus approached numerous potential investors, all of whom declined to make any investment in Redibs. Given the nature of Innovatus' claim, the determination by those potential investors that they were not willing to make any investment in Redibs is evidence of the lack of value of the methods that Innovatus claims are invaluable.